

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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UNITED STATES OF AMERICA

v.

RUSSELL JOHN THAXTON and
JENNIFER STANCLIFF,
Defendants.

No. 1:13-cr-162

BY

DEPUTY CLERK

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT 1

On or about August 29, 2013, in the District of Vermont, defendants RUSSELL JOHN THAXTON and JENNIFER STANCLIFF took, by force, violence, and intimidation, a material and compound containing a quantity of a controlled substance from the person and presence of another, namely, oxycodone and methylphenidate pills, that belonged to and were in the care, custody, control, and possession of a person registered with the Drug Enforcement Administration under Section 302 of the Controlled Substances Act (21 U.S.C. § 822), namely, Kinney Drugs pharmacy of Cambridge, with a replacement cost of the material and compound to the registrant of not less than \$500.

(18 U.S.C. §§ 2, 2118(a))

COUNT 2


1. On or about August 29, 2013, in the District of Vermont, defendants RUSSELL JOHN THAXTON and JENNIFER STANCLIFF knowingly and willfully conspired together and with others known and unknown to the grand jury to take, by force, violence, and intimidation, a material and compound containing a quantity of a controlled substance from the person and presence of another, namely, oxycodone and methylphenidate pills, that belonged to and were in the care, custody, control, and possession of a person registered with the Drug Enforcement Administration under Section 302 of the Controlled Substances Act (21 U.S.C. § 822), namely, Kinney Drugs pharmacy of Cambridge, with a replacement cost of the material and compound to the registrant of not less than \$500.

2. In furtherance of the conspiracy and to effect the object of the conspiracy, defendant RUSSELL JOHN THAXTON committed an overt act on or about August 29, 2013 in the District of Vermont by pointing an object resembling a firearm at an employee of the Kinney Drugs pharmacy of Cambridge and demanding that the employee give him controlled substances.

(18 U.S.C. §§ 2, 2118(a), (d))

A TRUE BILL

FOREPERSON

 (CSN) for
TRISTRAM J. COFFIN
United States Attorney
Burlington, Vermont
January 9, 2014